

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JOSE PANORA,  
*on his own behalf and on behalf of  
others similarly situated,*

Case No. 19-CV-7267 (BMC)

Plaintiff,

-against-

DEENORA CORP.  
d/b/a Dee's;  
DEE's BRICK OVEN PIZZA, INC  
d/b/a Dee's; and  
DEERAN ARABIAN a/k/a Dee Arabian

**DECLARATION OF AARON N.  
SOLOMON IN OPPOSITION TO  
PLAINTIFF'S MOTION FOR  
CONDITIONAL COLLECTIVE  
CERTIFICATION**

Defendants.

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**AARON N. SOLOMON, ESQ.**, declares under penalty of perjury:

1. I am a member of the bar of this Court and a partner at the law firm of Kaufman Dolowich & Voluck, LLP ("KDV"), attorneys for Defendants, Deenora Corp. d/b/a Dee's, Dee's Brick Oven Pizza, Inc. d/b/a Dee's and Deeran Arabian a/k/a Dee Arabian (collectively, "Defendants") in the above-captioned action.
2. This Declaration is based on my personal knowledge.
3. I submit this Declaration in opposition to Plaintiff's motion for conditional collective certification.
4. Annexed hereto as **Exhibit A** is a true and correct copy of the transcript for the February 12, 2020 hearing in this matter.
5. Annexed hereto as **Exhibit B** is a true and correct copy of the transcript for the August 20, 2020 hearing in this matter.

6. Annexed hereto as **Exhibit C** is a true and correct copy of the transcript for the August 1, 2019 hearing before the Hon. Paul A. Engelmayer, U.S.D.J. in *Yeh v. Han Dynasty, Inc.*, et al., 18 CV 6018 (PAE).

7. Annexed hereto as **Exhibit D** is the September 10, 2020 Declaration of Deeran Arabian submitted in opposition to Plaintiff's motion for conditional collective certification.

**WHEREFORE**, Defendants request Plaintiff's motion for conditional collective certification be denied, and, further, that the Court award all further relief that it deems to be just and proper.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct.

Executed on September 10, 2020.



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AARON. N. SOLOMON